

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE TURQUOISE HILL RESOURCES LTD.  
SECURITIES LITIGATION

Case No. 20-CV-08585-LJL

**NOTICE OF MOTION TO DISMISS THE  
SECOND AMENDED CLASS ACTION COMPLAINT**

PLEASE TAKE NOTICE THAT, upon the accompanying memorandum of law, the declaration of Gregory F. Laufer and the exhibits attached thereto, and all other papers herein, Defendants Turquoise Hill Resources Ltd., Luke Colton, Brendan Lane, and Ulf Quellmann shall move this Court, before the Honorable Lewis J. Liman, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York 10007, on a date and at a time to be determined by the Court, for an Order dismissing with prejudice all claims asserted in Plaintiffs' Second Amended Class Action Complaint (ECF No. 127) pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure and the Private Securities Litigation Reform Act of 1995, 15 U.S.C. §§ 78u-4, 78u-5, and for such other relief as the Court may deem just and proper.

Dated: New York, New York  
October 19, 2021

PAUL, WEISS, RIFKIND,  
WHARTON & GARRISON LLP

/s/ Gregory F. Laufer

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